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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking Concerning Relationship Between California Energy Utilities and Their Holding Companies and Non-Regulated Affiliates	Rulemaking 05-10-030 (Filed October 27, 2005)

COMMENTS OF THE GREENLINING INSTITUTE ON PROPOSED DECISION

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October 27, 2006

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On October 18, ALJ Vieth and Assigned Commissioner Brown, joined by President Peevey and Commissioners Bohn and Chong, heard arguments in support of the Proposed Decision as it relates to executive compensation transparency (GO-77m). The Proposed Decision on GO-77m was supported by Greenlining Institute, TURN (Reporters Transcript 55-59) and all of the utilities. As the utilities stated:

> ". . . we also support the proposed decision. We think it strikes the right balance. Mr. Gnaizda is correct. PG&E has been complying essentially with the new 77(m) and we have not had any significant problems with it or negative feedback, so we do support it" (RT 4).

The respondent utilities, however, represented by PG&E's legal counsel, opposed the ratepayers' right to secure said transparent information via the Internet on the basis of potential danger of identity theft.

In various fashions, this argument was rebutted by the comments and questions of the commissioners. This legal argument also appeared to be in direct conflict with PG&E's CEO leadership position on the issue of executive compensation transparency.

Section I of Greenlining's comments relates to what is not in dispute. Section II relates to the utilities' limited objection relating to ratepayer Internet access. And Section III relates to Greenlining's contention that there is a need for a generic proceeding or for studies in the general rate cases, such as the upcoming Sempra proceeding, to determine the impact of executive compensation on middle management and union wages, which are borne almost exclusively by the ratepayer. See, for example, the *Business Week* article of October 16 discussed at the hearing entitled "CEO Pay, I'll Have What He's Having." This article discusses a study from Stanford, Rutgers and Penn State that when a CEO is overpaid, it is "multiplied out over many levels" and affects middle management and non-management compensation levels.

Full Support from All Parties for Proposed Decision on Executive Compensation Pursuant to GO-77m

Greenlining, as set forth at the October 18 hearings, strongly supports the proposed decision, including Appendix B as it relates to GO-77m. The three affected utilities also support the proposed decision as it affects executive compensation transparency (Utilities Comments, RT 4).

This proposed decision is similar to the SEC position except that it covers all management with base salaries of $250,000 or more. It ensures that the CPUC is the leader in the nation in protecting ratepayers.

Although the proposed decision appears far-reaching, it should be noted that PG&E has already voluntarily provided such information, including having such information accompanied by a verified letter from its auditor. In addition, as the proposed decision notes, SoCal Edison, on May 11, was ordered in its rate case to comply with the SEC provisions and to follow the PG&E model. And Edison has never opposed such order or indicated any difficulty in complying. As the three affected utilities, represented by PG&E's counsel, acknowledged, this information will be made available via the Internet as it relates to the top five officials pursuant to the SEC requirements. The only issue raised regarding the proposed decision and GO-77m is the potential for identity theft. As the commissioners noted, if there is any potential for identity theft, it could only occur as to the top five officials whose names must be made available via the Internet and in the SEC proxy. All other officials covered will be nameless.

As set forth in Section II, the argument of the utilities to prohibit the ratepayers from securing Internet information on what top executives are earning is without merit, is totally inconsistent with the CEO of PG&E's strong support for executive compensation transparency, and appears to be lacking the support of any of the commissioners (Chong, RT 8; Bohn, RT 9-10; Brown, RT 10-11, 15; and Peevey, RT 11-15, 22).

Identity Theft is a Bogus Issue

The utilities' argument is that Internet access to the compensation of those with base salaries of $250,000 or more creates an identity theft problem. This is close to absurd on its face, since no names are provided and the utilities have never raised such an issue relating to their top five officials whose names are provided. Further, what is necessary for effective identity theft is your name, address and phone number, your date of birth, your social security number, driver's license, credit card and bank account information and your mother's maiden name.[1]

Yet none of the utilities demonstrated that the posting of comprehensive compensation would provide any information relating to name, address, phone number, date of birth, social security number, driver's license, credit card and bank account information or one's mother's maiden name.

It appears from the comments of the four commissioners present on October 18, that none gave serious consideration to the utility argument and some specifically ridiculed or seriously questioned such arguments.

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[1] See www.identitytheft911.org

See, for example, Assigned Commissioner Brown's statement to the utilities that this type of information has been made available in virtually every city and county in California on the Internet:

> Now I don't see a hue and cry, where the public is paying those salaries, from the employees about identity theft. Why should we, in this situation, treat the utility executives that are receiving a lot of money – of ratepayer money – any differently?" (RT 15)

And, as President Peevey stated:

> These are public utilities. People have a right to know . . . . Like I said, I don't buy the argument, the identity theft argument. (RT 22)

Ratepayers Pay for CEO Compensation, According to *Business Week*

Greenlining stated at the hearing and repeats herein that it fully supports the proposed decision and the Appendix B reporting system. However, Greenlining believes that in order to determine who bears the costs of executive compensation - the shareholder or the ratepayer - studies should be completed by either the CPUC and/or the three affected utilities on the issue of whether high or excessive CEO compensation affects the level of compensation of middle managers, and non-management, including union workers. Since the proposed decision is likely to result in a final decision before the end of the year, Greenlining suggests that the decision either order a post-decision study on this impact, in order to determine the cost to the ratepayers of excessive executive compensation, or state that such will be an issue in all forthcoming rate cases, including the upcoming Sempra rate case.

In this context, Commissioner Bohn suggested that the ratepayers are responsible for all CEO and top level compensation (RT 9-10):

> UTILITY REPRESENTATIVE: Everything else is paid for by shareholders. That would be long-term incentives, such as stock options ….
>
> COMMISSIONER BOHN: The value of which all depends on revenue, right?

> UTILITY REPRESENTATIVE: Well, it depends on how the stock market does and how the company does.
>
> COMMISSIONER BOHN: But, I mean, relative within the stock market one of the determining factors of value of that stock would be adequacy of revenue, which, in fact, is paid for by the ratepayers, right? (RT 9)

Furthermore, in response to Commissioner Chong's question to Greenlining (RT 20), Greenlining's expert stated that the Commission should institute a study on the impact of CEO compensation on ratepayer costs since ratepayers pay for inflated compensation of middle managers and union officials (Greenlining Opening Comments, August 7, 2006, Expert Opinion, Attachment A, p. 11, 2nd paragraph). As Greenlining's expert stated:

> Such a ratepayer study would demonstrate, I believe, that the salaries of the CEO and other top executives, but particularly the CEO, affect the amount of wages unions bargain for and have a significant impact on the compensation packages of all executives, as well as on most of middle management. Such a study would also show that when the disparities are great between the compensation of top executives and middle management, it affects management morale and efficiency. Similarly, such disparities often affect rank and file morale and efficiency. This makes it very difficult in times of crisis to rally the "troops" or to slash costs. Such compensation packages also affect CPUC staff in how they cometimes look at legitimate corporate expenditures as luxuries (See, for example, PG&E's clear need for a plane available for emergencies given the wide area it serves, and the hostility to this legitimate need) (Greenlining Opening Comments, August 7, 2006, pp. 11-12).

It should be noted that PG&E's CEO Tom King admitted during cross-examination at the PG&E rate case that CEO compensation could affect employee morale. (RT 2047:13-2048:4) It should also be noted that PG&E's chief expert on compensation, John Clark, at the rate proceeding admitted that PG&E had never done any studies on the impact of CEO compensation on the salary levels of middle management or union workers and that he believed that no other utility had completed such a study. (RT 1419:16 – 1421:3)

Although common sense alone would indicate that high compensation for CEOs affects middle management compensation and enhances the bargaining ability of unions, Greenlining refers to the *Business Week* article of October 16, titled “CEO Pay: I’ll Have What He’s Having”, which states that companies with the most bloated CEO pay create a 26% additional increase in compensation to those directly reporting to the CEO and 12% additional compensation to middle managers.

As set forth in Greenlining’s opening comments filed on August 12, Greenlining’s expert is willing to help design, on a pro-bono basis, such a study (should the CPUC wish such).

Given that some of the commissioners may believe in the value of the co-called independent studies of executive compensation that each of the utilities routinely use in the rate proceedings to demonstrate the legitimacy of compensation, Greenlining refers this Commission to the *New York Times’* comprehensive article of October 15 entitled “Corporate America’s Pay Pal.” As Greenlining set forth at the hearing, this article demonstrates that the so-called independent experts used by the utilities and paid for by the ratepayers are a crucial element in inflating rather than containing executive compensation.

In Greenlining’s opinion, this is further reason for securing a study on the impact of executive compensation on the ratepayers.

<u>Reporting Mechanism Should Be at $250,000 Base Salary</u>

Appendix B appears to require most of the comprehensive executive compensation reporting for those with a base salary of $125,000, although a prior subsection relating to comprehensive reporting relates only to those with $250,000 base salary.

The utilities oppose reporting at $125,000 base salary. Greenlining does not oppose reporting at $125,000, but believes that the purposes of a reporting system can be effectively carried out at a level of $250,000 or above. However, Greenlining urges that this be modified to all executive officers or those with a base compensation of $250,000.

The utilities also raised at the hearing concerns about inflation adjustments. Greenlining fully supports adjustments in the reporting based on inflation. We would suggest that the trigger for an increased base to $300,000 or more occur once there has been a demonstration that inflation has increased by 20%. This will allow the Commission to adjust the amount in round numbers every 5-7 years based on present inflation forecasts.

Greenlining offers one cautionary note. Base salary can be manipulated if cash bonuses are substantially increased. It may therefore be advisable to change the $250,000 base salary to the following:

> This comprehensive reporting shall be required of all executive officers and those whose combined salary <u>and cash bonuses</u> are at $250,000 or above. This index shall be adjusted for inflation upon showing of an increase in the cost of living of 20% over the aggregate years since the initiation of this reporting system.

<u>Recommended Action</u>

Greenlining, therefore, requests that the final decision either order the CPUC and/or the affected utilities to develop such a study with the cooperation of consumer groups, such as TURN and Greenlining or, in the alternative, that such a study be within the scope of future general rate cases, including the upcoming Sempra rate proceeding.

<u>Additional Data Relating to the Ratepayer's Right to Know</u>

The proposed decision does not include any requirement that utilities, in the posting of CEO compensation, provide a perspective or context for executive compensation. President Peevey raised this issue at the hearings (RT 21-22). Greenlining believes this so-called "shame" factor (Commissioner Bohn, RT 19) could be helpful in encouraging self-restraint. Greenlining's suggestion is for the final decision to include three types of information on the GO-77m form that are readily available to each of the utilities. They are:

- The median annual salary of non-management employees (PG&E provided such at its rate proceeding and it was $62,000);
- The annual philanthropic contributions of the utility to underserved communities and/or overall cash philanthropy (all utilities already provide such data to the CPUC and some, in effect, "advertise" their philanthropy as part of their demonstration of corporate responsibility); and
- The CEO's overall compensation compared with that at other utilities.[2]

Dated: October 27, 2006

Respectfully submitted,

/s/ Robert Gnaizda

Robert Gnaizda
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The Greenlining Institute

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[2] This could include just other major utilities in California or CEOs of major utilities across the United States. All data is readily available, since all are subject to the new SEC proxy requirements.

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of:

COMMENTS OF THE GREENLINING INSTITUTE ON PROPOSED DECISION

on all known parties to the above-captioned proceedings by mailing a properly addressed copy by first-class mail with postage prepaid, transmitting a facsimile copy, and/or transmitting an electronic copy to each party named in the official service list as maintained on the California Public Utilities Commission's web page.

Executed on October 27, 2006 at Berkeley, California.

/s/ Chris Vaeth

Chris Vaeth

SERVICE LIST

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